

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

Index No.: 15 Cr 333

vs.

GERY SHALON,
a/k/a "Garri Shalelashvili,"
a/k/a "Gabriel,"
a/k/a "Gabi,"
a/k/a "Phillipe Mousset,"
a/k/a "Christopher Engeham,"
JOSHUA SAMUEL AARON,
a/k/a "Mike Shields," and
ZIV ORENSTEIN,
a/k/a "Aviv Stein,"
a/k/a "John Avery,"

Defendants

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**SUPPLEMENTAL DECLARATION IN SUPPORT OF MOTION TO WITHDRAW AS
COUNSEL**

Igor Litvak., an attorney duly licensed to practice law before the courts of this State, and admitted to this court, hereby affirms the following to be true under penalty of perjury:

1. This Supplemental Declaration provides this Court with additional information relevant to my motion to withdraw as counsel. After I submitted the original motion to withdraw as counsel, I contacted the law clerk for the Honorable Laura Taylor Swain, United States District Judge in the Southern District of New York, who suggested obtaining a consent to withdrawal from Mr. Shalon to expedite the process. I immediately contacted Mr. Shalon's current attorney, Mr. Soshnick, in order to get his consent to my motion and to ask whether he would file a notice with the court consenting to my motion. Mr. Soshnick informed me that as soon as he receives copy of the case file from me (and another attorney Arkady Bukh)

he will recommend to Mr. Shalon to consent to my motion to withdraw at the earliest convenience.

2. I immediately emailed a complete copy of the case file in my possession to Mr. Soshnick. Later that day, Arkady Bukh informed me that he provided copy of his case file to Mr. Soshnick as well. The following day I contacted Mr. Soshnick and he confirmed the receipt of the copies of the files and consented, on behalf of the Mr. Shalon, to my withdrawal as counsel for Mr. Shalon. He also advised me that he would not be filing any document affirming his consent and should the Court want to confirm the consent, he is readily available to communicate this fact via phone.

3. Therefore, since Mr. Shalon consented to my withdrawal as his counsel, it is respectfully requested that the Court expeditiously make a ruling on my motion to withdraw.

4. In light of this new development, and for all of the foregoing reasons, it is respectfully requested that the Court permit me to withdraw as Defendant's attorney.

Dated: February 16th, 2018
Brooklyn, New York

Respectfully Submitted,

/s/ Igor Litvak, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2018 I caused to be filed a copy of the Motion to Withdraw with the Clerk of the Court via CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by CM/ECF system. In addition, I emailed a copy of this motion to Defendant's attorney Mr. Soshnick.

/s/ Igor Litvak, Esq.

Igor B Litvak